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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

GRACIELA HERRERA, et al.,

Plaintiffs,

vs.

CITY OF LOS ANGELES, et al.,

Defendants.

Case No. CV 16-02719 DSF (SKx)

*Honorable Dale S. Fischer*

**NOTICE OF CONDITIONAL  
SETTLEMENT OF ENTIRE  
ACTION PENDING APPROVAL**

**PLEASE TAKE NOTICE** that the parties have reached a conditional settlement of this entire case. However, the settlement is subject to approval from the Los Angeles City Council.

Upon approval of the settlement agreement, Plaintiffs will receive payment in two installments, the first payment to be made on or before May 11, 2018 and the second/final part of the settlement payment being made on or before September 1, 2018. Further, assuming Plaintiffs receive the two installment payments as agreed, and as part of the settlement agreement, a judgment will not be entered against any of the Defendants. Thus, a [proposed] judgment has not been submitted to the Court.

The Parties, through their respective counsel, request that this matter be stayed pending the approval of the settlement by the Los Angeles City Council. Further, the parties would request that the Court retain jurisdiction over this matter

1 for the limited purposes of 1) enforcing the settlement until the final settlement  
2 payment is received and the parties' formal stipulation of dismissal has been filed  
3 and granted, which is expected to occur in September of 2018, and 2) enforcing the  
4 terms of the protective order until all protected materials have been returned or  
5 destroyed as set forth in the protective order.

6 In the unlikely event that the settlement is not approved, the parties will  
7 immediately notify the Court and submit a [proposed] judgment.

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9 DATED: April 10, 2018

LAW OFFICES OF DALE K. GALIPO

11 By /s/ Eric Valenzuela

12 Dale K. Galipo  
13 Eric Valenzuela  
14 Attorneys for Plaintiffs

15 DATED: April 10, 2018

CITY OF LOS ANGELES ATTORNEY'S  
OFFICE

17 By: /s/ Colleen R. Smith

18 Cory M. Brente  
19 Colleen R. Smith  
20 Attorneys for Defendants  
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